

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board
for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, et al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**INFORMATIVE MOTION OF THE LAWFUL CONSTITUTIONAL DEBT
COALITION REGARDING ITS REQUEST TO BE HEARD
AT THE JUNE 28, 2019 HEARING**

To the Honorable United States District Court Judge Judith Gail Dein:

The Lawful Constitutional Debt Coalition (the “LCDC”)² submits this informative motion in response to the Court’s *Hearing Procedures Order* (Dkt. 7524) (the “Order”), and respectfully states as follows:

1. To the extent that the Court determines to hear argument on the *Motion of (I) Financial Oversight and Management Board, Acting Through Its Special Claims Committee, and (II) Official Committee of Unsecured Creditors, Under Bankruptcy Code Sections 105(a) and 502*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² See *Second Supplemental Verified Statement of the Lawful Constitutional Debt Coalition Pursuant to Federal Rule of Bankruptcy Procedure 2019* (Dkt. 7465).

and Bankruptcy Rule 3007, to (A) Extend Deadlines and (B) Establish Revised Procedures with Respect to Omnibus Objections to Claims by Holders of Certain Commonwealth General Obligation Bonds Issued in 2011, 2012 and 2014, and for Related Relief (Dkt. No. 7137 in 17-BK-3283) (the “Revised Procedures Motion”) at the June 28 Hearing, Susheel Kirpalani & Deborah Newman of Quinn Emanuel Urquhart & Sullivan, LLP, co-counsel for the LCDC, will appear at the June 28 Hearing in Courtroom 17C of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, NY 10007 and will present argument on the Revised Procedures Motion.³

2. The LCDC reserves its right to be heard on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned Title III cases to the extent it impacts the rights, claims, or interests of the LCDC.

[Signature page follows]

³ To the extent the Court hears argument on the *Urgent Motion of Financial Oversight and Management Board, Acting Through Its Special Claims Committee, and Official Committee of Unsecured Creditors Under Bankruptcy Code Sections 105(a) and 502 and Bankruptcy Rule 3007, to (I) Continue Hearing on Motion to Establish Claims Objection Procedures and (II) Extend Related Deadlines with Respect to Omnibus Objection to Claims of Holders of Certain Commonwealth General Obligation Bonds* (Dkt. No. 7528) (“Motion to Continue”) at the June 28 Hearing, Mr. Kirpalani and Ms. Newman intend to present argument on that motion as well.

DATED: June 24, 2019

Respectfully submitted,

REICHARD & ESCALERA

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CERTIFICATE OF SERVICE

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/ Carlos R. Rivera-Ortiz
USDC-PR 303409